

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

CARLA CALOBRISI)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:14-cv-00996-AJT-TRJ
BOOZ ALLEN HAMILTON INC.,)	
Defendant.)	

**PLAINTIFF CALOBRISI'S MOTION FOR LEAVE TO FILE UNDER SEAL
PORTIONS OF PLAINTIFF'S MEMORANDUM IN OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT AND EXHIBITS 4, 6, 12, 15, 17, 20, 30, 31, 37,
45, 47, 49, 50, 51, 53, 54, 57, 58, 60 AND 61 FILED WITH HER OPPOSITION BRIEF**

Plaintiff Carla Calobrisi, by and through her attorneys, moves this Honorable Court pursuant to Local Civil Rule 5 of this Court for leave to file under seal portions of Plaintiff's Memorandum in Opposition to Defendant's Motion for Summary Judgment ("Plaintiff's opposition brief") and Exhibits 4, 6, 12, 15, 17, 20, 30, 31, 37, 45, 47, 49, 50, 51, 53, 54, 58, 60 and 61 (the "proposed sealed exhibits") filed with her opposition to defendant's motion for summary judgment. In support of its motion, Plaintiff states as follows:

The proposed sealed exhibits and certain related portions of Plaintiff's opposition brief contain information designated as confidential by Defendant pursuant to the Second Agreed Protective Order or are otherwise deemed confidential. (Doc. #104.)

Local Civil Rule 5 provides the possibility of filing confidential, unredacted pleadings under seal, as well as material designated confidential. The Second Agreed Protective Order prohibits the unrestricted disclosure of confidential material "that reveals a trade secret, or other confidential research, development, or financial information that is commercially sensitive, or that otherwise is entitled to protective treatment under Fed. R. Civ. P. 26(c), and personal

information that is protected from disclosure by statute, regulation, or otherwise entitled to protection from public disclosure.” (*Id.*)

Certain documents cited by Plaintiff in Plaintiff’s opposition brief were designated confidential by defendant. Pursuant to Doc. #104, this confidential material should not be made publicly available. Accordingly, Plaintiff Calobrisi respectfully moves for leave to file Exhibits 4, 6, 12, 15, 17, 20, 30-31, 37, 45, 47, 49-51, 53-54, 57-58, 60-61, and certain related portions of Plaintiff’s brief in opposition under seal. Pursuant to paragraph 5 of Doc. #104 and paragraph 5(f) of the Rule 16(b) Order (Doc. #75), undersigned understands that defendant will be filing a response to this motion and a proposed order that meets the requirement of local rule 5. *See* Doc. #75 at Para. 5(f) (“Where a party moves to file material under seal because the opposing party has designated that material as confidential, the opposing party must file a response to the motion and a proposed order that meet the requirements of Local Civil Rule 5.”).

Plaintiff has filed a redacted version of Plaintiff’s opposition brief and the non-sealed exhibits contemporaneously with the filing of this motion.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the February 9, 2015, I served the foregoing through the Court's electronic filing system to the following, which will then send a notification of such filing ("NEF") to counsel identified below:

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